Standard Provisions Applicable to Waste Discharge Requirements

15. TREATMENT FAILURE

In an enforcement action, it shall not be a defense for the discharger that it would have been necessary to halt or to reduce the permitted activity in order to maintain compliance with this Order. Upon reduction, loss, or failure of the treatment facility, the discharger shall, to the extent necessary to maintain compliance with this Order, control production or all discharges, or both, until the facility is restored or an alternative method of treatment is provided. This provision applies, for example, when the primary source of power of the treatment facility fails, is reduced, or is lost. [CWC Section 13263(f)]

16. <u>DISCHARGES TO NAVIGABLE WATERS</u>

Any person discharging or proposing to discharge to navigable waters from a point source (except for discharge of dredged or fill material subject to Section 404 of the Clean Water Act and discharge subject to a general NPDES permit) must file an NPDES permit application with the Regional Board, [CCR Title 2 Section 22357]

17. ENDANGERMENT TO HEALTH AND ENVIRONMENT

The discharger shall report any noncompliance which may endanger health or the environment. Any such information shall be provided verbally to the Executive Officer within 24 hours from the time the discharger becomes aware of the circumstances. A written submission shall also be provided within five days of the time the discharger becomes aware of the circumstances. The written submission shall contain adescription of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected; the anticipated time it is expected to continue and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Executive officer, or an authorized representative, may waive the written report on a case-by-case basis if the oral report has been received within 24 hours. The following occurrence(s) must be reported to the Executive Officer within 24 hours:

- (a) Any bypass from any portion of the treatment facility.
- (b) Any discharge of treated or untreated wastewater resulting from sewer line breaks, obstruction, surcharge or any other circumstances.
- (c) Any treatment plant upset which causes the effluent limitation of this Order to be exceeded. [CWC Sections 13263 and 13267]

18. MAINTENANCE OF RECORDS

The discharger shall retain records of all monitoring information including all calibration and maintenance records, all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this Order, and records of all data used

Standard Provisions Applicable to Waste Discharge Requirements

to complete the application for this Order. Records shall be maintained for a minimum of three years from the date of the sample, measurement, report, or application. This period may be extended during the course of any unresolved litigation regarding this discharge or when requested by the Regional Board Executive Officer.

Records of monitoring information shall include:

- (a) The date, exact place, and time of sampling or measurements;
- (b) The individual(s) who performed the sampling or measurements;
- (c) The date(s) analyses were performed;
- (d) The individual(s) who performed the analyses;
- (e) The analytical techniques or method used; and
- (f) The results of such analyses.
- 19. (a) All application reports or information to be submitted to the Executive Officer shall be signed and certified as follows:
 - (1) For a corporation by a principal executive officer or at least the level of vice president.
 - (2) For a partnership or sole proprietorship by a general partner or the proprietor, respectively.
 - (3) For a municipality, state, federal, or other public agency by either a principal executive officer or ranking elected official.
 - (b) A duly authorized representative of a person designated in paragraph (a) of this provision may sign documents if:
 - (1) The authorization is made in writing by a person described in paragraph (a) of this provision.
 - (2) The authorization specifies either an individual or position having responsibility for the overall operation of the regulated facility or activity; and
 - (3) The written authorization is submitted to the Executive Officer.

Any person signing a document under this Section shall make the following certification:

Standard Provisions Applicable to Waste Discharge Requirements

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. [CWC Sections 13263, 13267, and 13268]"

20. OPERATOR CERTIFICATION

Supervisors and operators of municipal wastewater treatment plants and privately owned facilities regulated by the PUC, used in the treatment or reclamation of sewage and industrial waste shall possess a certificate of appropriate grade in accordance with Title 23, California Code of Regulations Section 3680. State Boards may accept experience in lieu of qualification training. In lieu of a properly certified wastewater treatment plant operator, the State Board may approve use of a water treatment plant operator of appropriate grade certified by the State Department of Health Services where reclamation is involved.

Each plant shall be operated and maintained in accordance with the operation and maintenance manual prepared by the municipality through the Clean Water Grant Program. [CWC Title 23, Section 2233(d)]

ADDITIONAL PROVISIONS APPLICABLE TO PUBLICLY OWNED TREATMENT WORKS' ADEQUATE CAPACITY

21. Whenever a publicly owned wastewater treatment plant will reach capacity within four years the discharger shall notify the Regional Board. A copy of such notification shall be sent to appropriate local elected officials, local permitting agencies and the press. The discharger must demonstrate that adequate steps are being taken to address the capacity problem. The discharger shall submit a technical report to the Regional Board showing flow volumes will be prevented from exceeding capacity, or how capacity will be increased, within 120 days after providing notification to the Regional Board, or within 120 days after receipt of notification from the Regional Board, of a finding that the treatment plant will reach capacity within four years. The time for filing the required technical report may be extended by the Regional Board. An extension of 30 days may be granted by the Executive Officer, and longer extensions may be granted by the Regional Board itself. [CCR Title 23, Section 2232]



DEPARTMENT OF THE NAVY COMMANDER NAVY REGION SOUTHWEST 937 N. HARBOR DRIVE SAN DIESO, CA 92132-0068

N REPLY REPER TO: 4600 Ser NO2/152 March 29, 2007

Ms. Sheila K. Vassey
Senior Staff Counsel
Legal and Public Affairs Office
California Water Resources Control Board
P.O. Hox 100
Sacramento, CA 95812-0100

Dear lis. Vassey:

On behalf of the Department of Defense Regional Environmental Coordinator for the military services in U.S. Environmental Protection Agency Region 9. In this capacity, my staff and I enjoy working cooperatively with the California Environmental Protection Agency and other state and local environmental agencies. In the past, our corroborations have enabled the exchange of information on environmental issues and the coordination of projects and initiatives in which our organizations have shared interests. This has helped us to avoid conflicts where possible and resolve differences amicably and efficiently, all toward the goal of greater compliance with environmental regulations.

I write regarding Water Quality Order No. 2006-0003 (Order). While the military services in California work to comply with state and local environmental laws and regulations, this particular order presents obstacles to federal agency compliance that cannot be overcome. As you are aware, the U.S. Congress must specifically authorize state regulatory authority over federal facilities through a clear statement of that intent in federal statute. In the case of the subject order, the Clean Water Act (CWA) does not contain such Congressional authorization.

The Order addresses Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems. In the Order, the State Water Resources Control Board (SWRCB) exempted private entities from regulation, while explicitly regulating public agencies, including federal agencies. This makes the Order discriminatory against the federal government. I note the definition of enrollee under the WDRs:

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A federal or state agency, municipality, county, district, and other public entity that owns or operates a sanitary sewer system, as defined in the general WDRs, and that has submitted complete and approved application for coverage under this (order)

while this definition specifically includes federal entities, private entities are, on the face of the Order, entirely unregulated. For the waiver of sovereign immunity to apply under the CWA, regulation of federal facilities must be conducted "in the same manner and to the same extent as any nongovernmental entity." Because the Order does not regulate private entities at all, it is discriminatory and any attempt to enforce its provisions against the federal government would be in violation of federal law.

The fact sheet for the Order makes clear that private entities were considered for regulation and rejected. The fact sheet groups collection systems into four categories, two of which are private. It goes on to state: "Privately owned systems (categories 3 and 4) are not subject to the WDRs . . . " and that regulating categories 3 and 4 on a statewide basis "would be unmanageable and impractical (because of the extremely large number and lack of contact information and other associated records)."

The waiver of sovereign immunity under the Clean Air Act, which has identical waiver language as the CWA, was analyzed in detail in a memorandum recently issued by the Chief Counsel for the California Air Resources Board, Applicability of Clean Air Act Waiver of Sovereign Immunity to Enforcement of ARB's Public and Utility Fleets Regulation Against Federal Fleets When Private Fleets are Generally Not Subject to the Regulation, Nov. 9, 2006, a copy of which is attached. The analysis contained in that memorandum persuasively demonstrates that the federal government cannot be compelled to comply in circumstances where regulatory requirements are not equally applicable to agencies of the federal government and private entities.

Order, Definition A. 3.

² 33 USC section 1323(a), CWA section 313(a).

³ Category 1 covers publicly-owned treatment works, 2 covers publicly-owned satellites, 3 covers private laterals and 4 covers privately owned treatment works.

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I must note that the DoD installations in California to which the Order purports to apply have made every effort thus far to comply with its applicable regulatory requirements. This is in accordance with the DoD's proactive policies on environmental compliance and stewardship. However, federal law simply prohibits further recognition of the authority of the Order until the Board adequately addresses this question of disparate treatment.

Thank you for your consideration of this matter. My point of contact should you have any questions or wish to discuss this matter in further detail is Mary Kay Faryan who can be reached at 619-532-4301.

RENE TREVINO
Executive Director
Commander.

Navy Region Southwest

Copy to: Eric Maag, Staff Engineer

State of California State Water Resources Control Board



Certificate of Competence

This is to certify that pursuant to the provisions of Chapter 9, Division 7 of the California Water Code

Thomas R. Niday

has fulfilled the requirements for certification as a

Grade III

Wastewater Treatment Plant Operator
Certificate Number 9986

Issued this January 10, 2018

Original Issue Date: 01/10/2018

Expiration Date: 01/10/2021

Felicia Marcus Chair



DISCHARGER: Naval Auxiliary Landing Field, San Clemente Island

NPDES NO.: CA0110175

NPDES NO.: CA0110175

REPORT FOR: January - December 2013 **REPORT DUE**: 02 May 2018

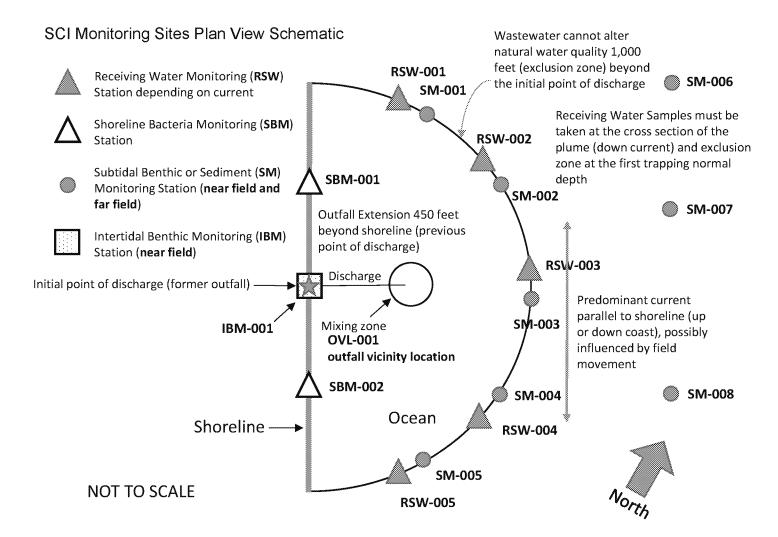
SAMPLE POINT: RW1 through RW4 (January to August 2013). RSW-01 through RSW-05 (September-December 2013), SBM-01 and SBM-02 (September-December 2013); Receiving Water at 1000' and Nearshore, respectively

Pa	Total Coliform		Fecal Coliform		Enterococcus		Dissolved Oxygen		Hq		рН		Temperature			
Min Freque	ency/Sample Type	Quarterly/Grab		Quarterly/Grab		Quarterly/Grab		Quarterly/Grab		Quarterly/Grab		Quarterly/Grab (Field)		Quarterly/Grab		
			SM92	l Method: 21B/E	SM92	l Method: 21B/E	Analytical Method: SM9230		Analytical Method: SM 4500-O G-2011		Analytical Method: SM 4500-H		Analytical Method: SM 4500-H		Analytical Method: SM 2550 B-2010	
Location	Date	Time	Sample Value (MPN/100ml)	MDL (MPN/100ml)	Sample Value (MPN/100ml)	MDL (MPN/100ml)	Sample Value (MPN/100ml)	MDL (MPN/100ml)	Sample Value (mg/L)	MDL (mg/L)	pH Units	MDL (pH units)		MDL (pH units)	Sample Value (C°)	MDL (F°)
RW1	02/15/2013	08:33	ND	2	ND	2	ND	2	2.4		7.97	N/A	7.94	N/A	13.8	N/A
RW1	05/10/2013	08:15	ND	2	ND	2	ND	2	1.72		8	N/A	7.58	N/A	17.8	N/A
RW1	08/06/2013	09:00	ND	2	ND	2	ND	2	3.76		8.13	N/A	7.25	N/A	18.5	N/A
RW2	02/15/2013	08:58	ND	2	ND	2	ND	2	1.79		8.04	N/A	7.9	N/A	14.2	N/A
RW2	05/10/2013	09:00	ND	2	ND	2	ND	2	2.35		8.12	N/A	7.7	N/A	17.9	N/A
RW2	08/06/2013	09:35	ND	2	ND	2	ND	2	2.25		8.19	N/A	7.81	N/A	18	N/A
RW3	02/15/2013	08:49	ND	2	ND	2	ND	2	1.77		8.13	N/A	7.91	N/A	13.8	N/A
RW3	05/10/2013	08:45	ND	2	ND	2	ND	2	2.39		8.1	N/A	7.67	N/A	18.1	N/A
RW3	08/06/2013	09:25	ND	2	ND	2	ND	2	2.34		8.21	N/A	7.83	N/A	64.6	N/A
RW4	02/15/2013	08:43	4	2	4	2	ND	2	1.98		8.15	N/A	7.94	N/A	13.5	N/A
RW4	05/10/2013	08:30	ND	2	ND	2	ND	2	2.3		8.05	N/A	7.71	N/A	18.2	N/A
RW4	08/06/2013	09:10	ND	2	ND	2	ND	2	3.97		8.2	N/A	7.76	N/A	18.2	N/A
RSW-01-Surface	09/30/2013	07:58	ND	2	ND	2	ND	2	-	-	-	-	-	-	18.3	N/A
RSW-01-Mid	09/30/2013	07:54	ND	2	ND	2	ND	2	-	-		-		-	17.5	N/A
RSW-01-Bottom	09/30/2013	07:52	ND	2	ND	2	ND	2	-	-	-	-	-	-	15.4	N/A
RSW-02-Surface	09/30/2013	08:09	ND	2	ND	2	ND	2	-	-	-	-	-	-	19	N/A
RSW-02-Mid	09/30/2013	08:06	ND	2	ND	2	ND	2	-	-	-	-	-	-	18	N/A
RSW-02-Bottom	09/30/2013	08:02	ND	2	ND	2	ND	2	-	-	-	-	-	-	15.7	N/A
RSW-03-Surface	09/30/2013	08:19	ND	2	ND	2	ND	2	-	-	-	-	-	-	18.5	N/A
RSW-03-Mid	09/30/2013	08:16	ND	2	ND	2	2	2	-	-	-	-	-	-	17.9	N/A
RSW-03-Bottom	09/30/2013	08:14	ND	2	ND	2	ND	2	-	-	-	-	-	-	15.6	N/A
RSW-04-Surface	09/30/2013	08:27	ND	2	ND	2	ND	2	-	-	-	-	-	-	18.5	N/A
RSW-04-Mid	09/30/2013	08:23	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.4	N/A
RSW-04-Bottom	09/30/2013	08:21	ND	2	ND	2	ND	2	-	-	-	-	-	~	15.6	N/A
RSW-05-Surface	09/30/2013	08:33	ND	2	ND	2	ND	2	-	-	-	-	-	-	18.5	N/A
RSW-05-Mid	09/30/2013	08:31	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.8	N/A
RSW-05-Bottom	09/30/2013	08:29	ND	2	ND	2	ND	2	-	-	-	-	-	-	15.5	N/A
SBM-01-Surface	09/30/2013	08:50	ND	2	ND	2	ND	2	-	-	-	-	-	-	19	N/A
SBM-01-Mid	09/30/2013	08:48	2	2	2	2	ND	2	-	-	-	-	-	-	18.9	N/A
SBM-01-Bottom	09/30/2013	08:46	2	2	ND	2	ND	2	-	-	-	-	-	-	18.9	N/A
SBM-02-Surface	09/30/2013	08:40	ND	2	ND	2	ND	2	-	-	-	-	-	-	19	N/A
SBM-02-Mid	09/30/2013	08:39	ND	2	ND	2	ND	2	-		-	-	-	-	18.8	N/A
SBM-02-Bottom	09/30/2013	08:37	ND	2	ND	2	ND	2	-	-	-	-	-	-	18.8	N/A
RSW-01-Surface	10/31/2013	09:09	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.9	N/A
RSW-01-Mid	10/31/2013	09:07	ND	2	ND	2	ND	2	- 1	-	-	-	-	-	17.9	N/A
RSW-01-Bottom	10/31/2013	09:05	ND	2	ND	2	ND	2	- 1	-	-	-	-	-	17.7	N/A
RSW-02-Surface	10/31/2013	08:59	ND	2	ND	2	ND	2		-	-	-	-	-	18	N/A

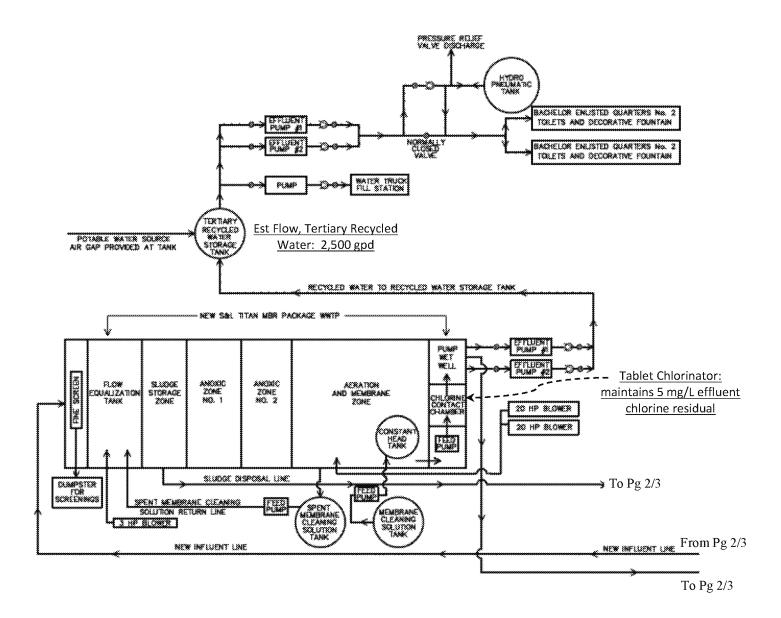
				,		,			,		·	·	r	· _r	,	
RSW-02-Mid	10/31/2013	08:57	ND	2	ND	2	ND	2	-		-	-	-	-	18.1	N/A
RSW-02-Bottom	10/31/2013	08:58	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.7	N/A
RSW-03-Surface	10/31/2013	07:55	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.6	N/A
RSW-03-Mid	10/31/2013	07:51	ND	2	ND	2	ND	2	-	-	-	-	-	~	17.4	N/A
RSW-03-Bottom	10/31/2013	07:40	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.3	N/A
RSW-04-Surface	10/31/2013	08:08	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.5	N/A
RSW-04-Mid	10/31/2013	08:06	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.3	N/A
RSW-04-Bottom	10/31/2013	08:49	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.2	N/A
RSW-05-Surface	10/31/2013	08:26	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.6	N/A
RSW-05-Mid	10/31/2013	08:23	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.5	N/A
RSW-05-Bottom	10/31/2013	08:18	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.3	N/A
SBM-01-Surface	10/31/2013	08:50	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.4	N/A
SBM-01-Mid	10/31/2013	08:47	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.5	N/A
SBM-01-Bottom	10/31/2013	08:45	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.5	N/A
SBM-02-Surface	10/31/2013	08:37	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.6	N/A
SBM-02-Mid	10/31/2013	08:35	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.8	N/A
SBM-02-Bottom	10/31/2013	08:32	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.3	N/A
RSW-01-Surface	11/22/2013	10:25	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.5	N/A
RSW-01-Mid	11/22/2013	10:20	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.5	N/A
RSW-01-Bottom	11/22/2013	10:15	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.4	N/A
RSW-02-Surface	11/22/2013	10:10	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.5	N/A
RSW-02-Mid	11/22/2013	10:05	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.5	N/A
RSW-02-Bottom	11/22/2013	10:00	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.5	N/A
RSW-03-Surface	11/22/2013	09:55	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.3	N/A
RSW-03-Mid	11/22/2013	09:50	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.3	N/A
RSW-03-Bottom	11/22/2013	09:45	ND	2	ND	2	ND	2	-	-	-	-	-	-	16	N/A
RSW-04-Surface	11/22/2013	09:25	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.1	N/A
RSW-04-Mid	11/22/2013	09:20	ND	2	ND	2	ND	2	-	-	-	-	-	~	16.1	N/A
RSW-04-Bottom	11/22/2013	09:15	ND	2	ND	2	ND	2	-	-	-	-	-	-	15.9	N/A
RSW-05-Surface	11/22/2013	09:40	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.3	N/A
RSW-05-Mid	11/22/2013	09:35	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.2	N/A
RSW-05-Bottom	11/22/2013	09:30	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.1	N/A
SBM-01-Surface	11/22/2013	08:55	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.6	N/A
SBM-01-Mid	11/22/2013	08:50	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.7	N/A
SBM-01-Bottom	11/22/2013	08:45	ND	2	ND	2	ND	2	-	-	-	-	-	-	17.6	N/A
SBM-02-Surface	11/22/2013	09:10	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.1	N/A
SBM-02-Mid	11/22/2013	09:05	ND	2	ND	2	ND	2	-	-	-	-	-	-	16.1	N/A
SBM-02-Bottom	11/22/2013	09:00	ND	2	ND	2	ND	2	-	-	-	-	-	-	16	N/A
RSW-01-Surface	12/20/2013	08:26	ND	2	ND	2	ND	2	-	-	-	-	-	_	15	N/A
RSW-01-Mid	12/20/2013	08:21	ND	2	ND	2	ND	2	-	-	-	-	-	-	14.9	N/A
RSW-01-Bottom	12/20/2013	08:16	ND	2	ND	2	ND	2	_	_	-	-	-	_	14.6	N/A
RSW-02-Surface	12/20/2013	08:41	ND	2	ND	2	ND	2	_	-	-	_		-	15.1	N/A
RSW-02-Mid	12/20/2013	08:38	ND	2	ND	2	ND	2	_	-	-	-	-	-	15	N/A
RSW-02-Bottom	12/20/2013	08:35	ND	2	ND	2	ND	2	-	-	-	_	-	-	15.6	N/A
RSW-03-Surface	12/20/2013	08:57	ND	2	ND	2	ND	2	-		-	-	-	-	15	N/A
RSW-03-Mid	12/20/2013	08:54	ND	2	ND	2	ND	2	_	-	-	-	-	-	15.3	N/A
RSW-03-Rottom	12/20/2013	08:47	ND	2	ND	2	ND	2		 	_		_		15.5	N/A
RSW-04-Surface	12/20/2013	09:14	ND	2	ND ND	2	ND	2	-	-	-	-	-	-	15.4	N/A
RSW-04-Surface	12/20/2013	09:09	ND	2	ND ND	2	ND	2	<u> </u>	<u> </u>		<u> </u>	-	-	15.5	N/A
RSW-04-Nild	12/20/2013	09:04	ND	2	ND ND	2	ND	2		 		_	-	-	15.6	N/A
RSW-05-Surface	12/20/2013	09:30	ND	2	ND ND	2	ND	2	<u> </u>	-				-	15.2	N/A
RSW-05-Mid	12/20/2013	09:30	ND	2	ND	2	ND	2	-	-	_	_		-	15.4	N/A
RSW-05-Ivilu	12/20/2013	09:20	ND	2	ND ND	2	ND	2	-	-	-	-	-	-	15.4	N/A
LIONA -02-BOLLOILI	12/20/2013	L 05:20	T ND	L	Т ил	L	ND	L	L	L		L	I	<u> </u>	13.2	IN/A

SBM-01-Surface	12/20/2013	09:57	ND	2	ND	2	2	2	-	-	-	-	-	-	15.4	N/A
SBM-01-Mid	12/20/2013	09:54	ND	2	ND	2	ND	2	-	-	-	-	-	-	15.4	N/A
SBM-01-Bottom	12/20/2013	09:50	ND	2	ND	2	ND	2	-	-	-	-	-	-	15.9	N/A
SBM-02-Surface	12/20/2013	09:47	ND	2	ND	2	ND	2	-	-	-	-	-	-	15.3	N/A
SBM-02-Mid	12/20/2013	09:42	ND	2	ND	2	ND	2	-	-	-	-	-	-	15.4	N/A
SBM-02-Bottom	12/20/2013	09:38	ND	2	ND	2	ND	2	-	-	-	-	-	-	15.8	N/A

Figure 1



SCI Wastewater Treatment Plant Process Flow Diagram



SYMBOLS & ABBREVIATIONS D = O ECK VALVE C = CATE VALVE LET = LOAD EQUALIZATION TANK

S = NON-INTERSECTING PPES S = FLOW DIRECTION

